

DECISION MEMO

TONGASS NATIONAL FOREST ADMIRALTY ISLAND NATIONAL MONUMENT

HECLA GREENS CREEK MINING COMPANY 2016 SURFACE EXPLORATION PLAN

DECISION

It is my decision to authorize the 2016 Surface Exploration Annual Work Plan of Hecla Greens Creek Mining Company (HGCMC), as proposed in their September 30, 2015 submittal. Approved activities include drilling, geologic mapping, geochemical sampling, and the installation of a temporary radio repeater antenna. The project may commence as early as April, and must end by October 31, 2016. The project area is located in sections 31 of T. 43 S, R. 66 E.; and sections 9 and 10 in T. 44 S., R. 67 E. (Copper River Meridian). Exploration drilling is an essential activity that defines the extent of available mineral resources, and is the main factor in extending mine life; the public's right to explore and develop locatable minerals, including right of access, is granted through the 1872 Mining Law.

In addition to the mitigation activities stated in the 2016 Surface Exploration Annual Work Plan, the following requirements are included in this decision:

- No roads will be constructed.
- HGCMC will comply with the requirements of the State of Alaska.
- HGCMC will conduct pre-work surveys to document the presence or absence of threatened and endangered plant and animal species. If any previously undiscovered endangered, threatened, candidate, or sensitive species, or key habitats for any management indicator species are encountered prior to or during project implementation, a District Biologist must be consulted.
- To avoid disturbing raptor nests, helicopters should maintain flight paths 1000 feet above ground level and avoid flying within 1000 feet (vertically and horizontally) of any known nests.
- Prior to clearing proposed sites, an independent wildlife biologist will field check suitable habitat within 600 feet of the drilling platform site for nesting northern goshawks. If nests or potential nests are found, they will be reported immediately to the USFS District Biologist so Forest Plan standards and guidelines can be implemented. The site will not be developed if a nest and/or potential nest is found.
- To avoid introduction of invasive species to the project area, HGCMC should wash construction tools and drilling equipment prior to first entering an uninfested area and when re-entering an uninfested area from an area that is potentially infested by invasive plants (this includes the helicopter staging area).
- HGCMC should use native material, when available, to revegetate bare soil resulting from project activity if prompt natural regeneration is not expected (see current Tongass National Forest seeding guidelines).
- When feasible, HGCMC should inspect areas where material has been imported for 2-3 years afterwards to ensure no invasive plants are present.
- Coconut fiber matting should be used for erosion control as an alternative to straw bales when available and practical.
- The Forest Service recommends HGCMC diligently maintain their established 200-foot

buffer between flowing streams and proposed drilling sites.

- To avoid erosion and discharge impacts to streams, all activities (including drilling, construction of facilities, helicopter landing pads, hand dug sumps, and any overland travel) should be kept at least 50 meters (164 feet) from flowing water.
- HGCMC should use gravity intake wherever possible and sumps should be located as far upstream as feasible to avoid habitat used by fish of any species. When a pump must be used, it is recommended that HGCMC install a 1/8" screen on pump intake hoses even when utilizing a 5-gallon bucket with drilled holes. This measure would help alleviate the need for field crews to decide if fish are present in water withdrawal locations.
- In situations when stream levels are extremely low and field crews experience difficulty maintaining sufficient intake flows, the Forest Service recommends work be suspended until flows increase to minimize potential dewatering impacts to fish in downstream Class I and II habitat.
- Fuel should be stored at least 100 meters from flowing water. Water pumps located near a stream should be in covered secondary containment. During any transfer of fuel, an adequately-sized spill kit must be present and staff should know how to properly use it.

This activity falls within a category of actions which normally do not individually or cumulatively have a significant effect on the quality of the human environment and, therefore, may be categorically excluded from documentation in an environmental impact statement or environmental assessment. This category of actions is identified in 36 CFR 220.6(e)(8) as: Short-term (1 year or less) mineral, energy, or geophysical investigation and their incidental support activities that may require cross-country travel by vehicles and equipment, construction of less than 1 mile of low standard road, or use and minor repair of existing roads.

No extraordinary circumstances exist which would result in additional impacts. No irreversible or irretrievable commitments of resources are anticipated.

PUBLIC INVOLVEMENT

A letter dated November 25, 2015 was sent to 17 native groups, agencies, other groups, and individuals that might have an interest in the project. The State of Alaska was the only respondent. The Alaska Department of Natural Resource stated that a fish habitat permit is not required.

BIOLOGICAL EVALUATION

Biological Evaluations were completed for plants and animals. The proposed radio repeater station is located in potential sensitive habitat; the site was surveyed in 2014 and no sensitive plants were found. Five species of plants listed in the Alaska Natural Heritage Program rare plant tracing list were found in the vicinity of the project area; however, all occurrences are separated from the nearest proposed drilling site by at least 1 mile and the project will have no direct, indirect, or cumulative impact on known occurrences of rare plants. The overall risk of invasive plant establishment from implementation of this project is low due to the nature and location of this project and mitigation measures to be implemented. If mitigation measures are not implemented or only partially implemented, the overall infestation risk for this project increases to moderate.

The goshawk is a sensitive species that occupies old-growth forest habitat in Southeast Alaska. Specific direction for goshawks in the Tongass National Forest Land and Resource Management Plan (Forest Plan) includes the instruction to "conduct inventories to determine the presence of nesting goshawks for proposed projects that affect goshawk habitat." Prior to clearing any proposed

sites, an independent wildlife biologist will field check suitable habitat within 600 feet of the platform site for nesting northern goshawks using a tree-by-tree search (prior to June 1) or broadcast acoustic survey (June 1 through August 15). If nests or potential nests are found, they will be reported immediately to the USFS District biologist so Forest Plan standards and guidelines can be implemented. The site(s) will not be developed if a nest and/or potential nest is found. The project may impact individual goshawks; however, this will be mitigated by maintaining flights at 1000 feet above ground level, consistent with Forest Plan standard and guidelines. Surveys and following Forest Plan standards and guidelines for nest detections should prevent the destruction of nests.

The bald eagle (*Haliaeetus leucocephalus*) is a Management Indicator Species because of its use of coastal areas for foraging and nesting. No work is planned to occur near known nest sites based on GIS analysis. However, helicopter flights to and from the area could disturb nesting eagles. Consistent with Forest Plan standards and guidelines, helicopters are expected to maintain flight paths 1000 feet from nests during breeding season (except for safety reasons). There are no known nests within 1000 feet of the helicopter base or any of the proposed drilling pads. Therefore, the project is expected to have negligible effects on bald eagles, and no impacts to bald eagle viability are expected.

FINDINGS REQUIRED BY OTHER LAWS

2008 Tongass Land and Resource Management Plan

This decision is consistent with the Forest Plan. The project is located within an area identified in the Forest Plan as having a Land Use Designation (LUD) of Non-Wilderness National Monument. Direction for management of this area is to permit reasonable access to mining claims in accordance with the provisions of an approved Plan of Operations.

ANILCA Sections 810 & 811, Subsistence Evaluation and Finding

The effects of this project have been evaluated to determine potential effects on subsistence opportunities and resources. There is no documented or reported subsistence use that would be restricted as a result of this decision. For this reason, this action would not result in a significant possibility of a significant restriction of subsistence use of wildlife, fish, or other foods.

Roadless Area Conservation

The proposed drilling sites are located within the Greens Creek Inventoried Roadless Area. Chief of the Forest Service approval to cut trees in support of exploration activities was received on January 27, 2016.

Endangered Species Act of 1973

Biological evaluations have been completed for this action. No Federally listed threatened or endangered species will be affected by this activity.

National Historic Preservation Act of 1966

The Forest Service program for compliance with the National Historic Preservation Act (NHPA) includes locating, inventorying and evaluating the National Register of Historic Places eligibility of historic and archeological sites that may be directly or indirectly affected by scheduled activities. Regulations (36 CFR 800) implementing Section 106 of the NHPA require Federal agencies to consider the effects of their actions on sites that are determined eligible for inclusion in or are listed in the National Register of Historic Places (termed "historic properties"). A Forest Service archeologist has reviewed this project and we have made a determination of No Historic Properties Affected in the area of potential effect for the proposed project.

Floodplain Management (E.O. 11988), Protection of Wetlands (E.O. 11990)

This activity will not impact the functional value of any floodplain as defined by Executive Order 11988 and will not have negative impacts on wetlands as defined by Executive Order 11990.

Recreational Fisheries (E.O. 12962)

Federal agencies are required, to the extent permitted by law and where practicable, and in cooperation with States and Tribes, to improve the quantity, function, sustainable productivity, and distribution of U.S. aquatic resources for increased recreational fishing opportunities. As required by this Order, I have evaluated the effects of this action on aquatic systems and recreational fisheries and documented those effects relative to the purpose of this order. Since there are no effects to fisheries resources within the project area there will be no direct, indirect or cumulative impacts related to this Order.

Environmental Justice (E.O. 12898)

I have determined that, in accordance with Executive Order 12898, this project does not have disproportionately high and adverse human health or environmental effects on minority populations and low-income populations.

Invasive Species (E.O. 13112)

Executive Order 13112 directs Federal agencies to identify actions which may affect the status of invasive species; prevent the introduction of invasive species; detect and respond rapidly to and control populations of such species; monitor invasive species populations; and to provide for restoration of native species and habitat conditions in ecosystems that have been invaded. Actions to be taken include planning at the local, tribal, and state level for species that are likely to cause economic or environmental harm, or, regional, and ecosystem levels, in cooperation with stake holders and organizations addressing invasive species. Agencies are not to fund or authorize actions that the agency believes are likely to cause or promote the introduction or spread of invasive species, unless the benefits of the action outweigh the potential harm caused by the species.

An invasive plant risk assessment has been completed for this project, findings and recommended mitigation measures are incorporated into project design and decision. Refer to Invasive Weed Risk Assessment for mitigation measures addressing the management of invasive plants.

Magnuson-Stevens Fishery Conservation and Management Act

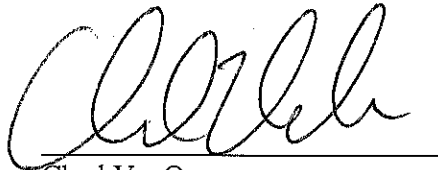
There would be negligible effects on freshwater or marine habitat because the proposal will not impact fish habitat and no effects would be transported to the marine environment during activities associated with this project. Thus, there is no adverse effect on Essential Fish Habitat from this project.

IMPLEMENTATION DATE

This action falls within a category of actions which are not subject to appeal. Implementation of this decision may occur immediately.

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Monument Ranger

2/16/2016
Date

Distribution

Kyle Moselle, Alaska Department of Natural Resources

